

John White, Esq.,

E-filed: 4/4/11

SB #1741

335 West First Street

Reno, NV 89503

Telephone: (775) 322-8000

Facsimile: (775) 322-1228

john@whitelawchartered.com

Attorney for Never Enough Ballroom, LLC.

UNITED STATES BANKRUPTCY COURT
DISTRICT OF NEVADA

In re:

) CASE NO: BK-N-09-53082-gwz

)

) Chapter 11

)

) DEBTOR'S RESPONSE TO MOTION
TO CONVERT

)

) Hearing Date: April 20, 2011

)

) Hearing Time: 2:00 p.m.

NEVER ENOUGH BALLROOM, LLC., by counsel, hereby responds to the U.S.

Trustee's Motion to Convert or Dismiss ("Motion"), filed herein on March 21, 2011 (Docket 65)
as follows:

DUTY TO FILE QUARTERLY REPORTS: Debtor is now current with its obligation to
file post-confirmation operating reports, to wit: Debtor was current with its Monthly Operating
Report requirement on October 8, 2010, when the Order Confirming its Chapter 11 Plan was
entered. On March 30, 2011, Debtor filed a tardy Quarterly Operating Report for the remainder
of Fourth Quarter, 2010. Debtor's Quarterly Report for the First Quarter, 2011, is not yet
due, but will be filed no later than April 15, 2011. See Affidavit of Pat Ehlers, filed separately
herewith.

1 DUTY TO PAY QUARTERLY FEES: The U.S. Trustee estimates in the Motion that
2 Debtor's unpaid quarterly fees through the end of Fourth Quarter 2010 are \$3,594.08. Since
3 the Motion was filed, Debtor has paid \$2,594.08 of that sum. See affidavit of Pat Ehlers, filed
4 separately herewith. This leaves a balance due of \$1,000 at this time. Debtor estimates that this
5 \$1,000 will be paid on or about April 15, 2011, being a date before the Motion is to be heard and
6 in any event before the hearing on the Motion.
7

8 Debtor plans to promptly pay the estimated \$650 Quarterly U.S. Trustee fees as they
9 become due for the First Quarter of 2011, upon being billed for fees due for that Quarter.
10

11 Dated April 4th, 2011.

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14 By: 

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28 CHARTERED
LAWYERS

20TH CENTURY BLDG
335 W FIRST STREET
RENO, NV 89503

T (775) 322-8000
F (775) 322-1228